UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DANIEL PRESTON,	:	12 CV 1393 (ALC)(JLC)
Plaintiff,	:	
-against-	:	
ABSECON MILLS, INC.,	:	DECLARATION OF CHRISTIAN WIENANDS
Defendant.		

Pursuant to 28 U.S.C. § 1746, Christian Wienands declares that the following facts are true and correct, subject to the laws against perjury of the United States of America:

1. I am the president of American Liba, Incorporated ("American Liba"), the North American representative of Liba Maschinenfabrik GmbH ("Liba"), the manufacturer of warp knitting machines for tricot, raschel and weft insertion fabrics.

2. I have worked with both Daniel Preston ("Preston") and Absecon Mills, Inc. ("Absecon"), and have excellent relations with both. Although Preston asked me to submit this declaration, I have agreed to do so not because I wish to be adverse to Absecon, but because I have personal knowledge of the facts set forth below which may not be available from any other disinterested source.

3. The machine made by Liba that Absecon is currently using (the "Liba Machine") is not a standard, off-the-shelf machine. It was custom made according to confidential specifications provided to Liba by Preston.

4. To my knowledge, the machine had not been modified since we installed it.

5. Since the 1980s, Liba has manufactured approx. 240 warp knitting machines with multiaxial weft insertion. To my knowledge, this is the only machine capable of producing 22.5, 67.5.-67.5, -22.5-degree configurations, which had been Preston's idea and represents a

deviation from the standard 0, 45, 90, -45- degree configurations. American Liba worked with Preston to design and custom-build a machine capable of producing fabrics with these angle configurations.

6. I am not aware that anyone else is also using structural yarn or superfiber (such as aramid or ultra-high molecular weight polyethylene) in the knit to improve the performance of ballistic fabric. The Liba Machine was specifically tested to allow the use of these high strength fibers.

7. To my knowledge, the Liba Machine is the only machine being used and specifically tested to allow the fabric it produces to be layered and knit a second time so that it can structurally consolidate up to 100 uniaxial layers into a single sheet of fabric. Aside from Preston, no one had ever asked American Liba to build a machine with this capability.

8. American Liba worked with Preston for several years to develop the Liba Machine. I am aware of no other machines that can do what the Liba Machine can do.

Dated: Piedmont, South Carolina
March 8, 2012

CHRISTIAN WIENANDS